

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Joel G. MacMull *Pending Admission Pro Hac Vice*

Arla D. Cahill

**MANDELBAUM SALSBURG, P.C.**

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*Attorneys for Defendant Peony Lin*

TZUHSIN YANG a/k/a  
CHRISTINE YANG,

*Plaintiff,*

v.

PEONY LIN, an individual, and  
JANE DOE, an unknown individual,

*Defendants.*

Civil Action No.

19-cv-8534

**NOTICE OF MOTION TO DISMISS  
THE COMPLAINT PURSUANT TO  
FED. R. CIV. P. 12(b)(6)**

**Motion Return Date: May 20, 2019**

**PLEASE TAKE NOTICE** that the undersigned, counsel for defendant Peony Lin (“defendant”) shall move before the Honorable Esther Salas, U.S.D.J., United States District Court, District of New Jersey, located at 50 Walnut Street, Newark, New Jersey 07101 on May 20, 2019, at 9:30 a.m. or as soon thereafter as counsel may be heard, for an order granting defendant’s motion to dismiss the Complaint;

**PLEASE TAKE FURTHER NOTICE** that defendant will rely upon the Declaration of Arla Cahill, Esq. dated April 23, 2019 in support of the motion to dismiss the Complaint and its accompanying exhibits as well as the memorandum of law in Support of the motion to dismiss the

Complaint submitted herewith. A proposed form of order granting the relief sought in the motion is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested only if opposition is filed.

Respectfully submitted,  
**MANDELBAUM SALSBURG, P.C.**

By: /s/ Arla Cahill

Arla D. Cahill

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*Attorneys for Defendant*

*Peony Lin*

Dated: April 23, 2019